

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

POWER INVESTMENTS, LLC,)	
)	
Plaintiff/Counterclaim-)	
Defendant,)	
)	Case No. 4:21-cv-01022
vs.)	
)	
CARDINALS PREFERRED, LLC,)	
)	
Defendant/Counterclaim-)	
Plaintiff.)	

**CARDINALS PREFERRED, LLC’S MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Defendant Counterclaim-Plaintiff Cardinals Preferred, LLC (“Cardinals”), pursuant to Fed. R. Civ. P. 65, hereby moves for a temporary restraining order and preliminary injunction against Power Investments, LLC (“Power”). As set forth in Cardinals’ Memorandum in Support filed contemporaneously herewith and incorporated by reference, Cardinals respectfully requests the immediate entry of a temporary restraining order to prevent further irreparable harm to Cardinals as a result of Power’s attempt to remove Cardinals’ appointees on Ashley Energy LLC’s Board of Managers in violation of the Company’s Operating Agreement (as defined in the Memorandum) until Cardinals’ request for a preliminary injunction may be heard and decided. Finally, pursuant to the Operating Agreement, the parties waived the necessity of posting any form of bond related to the issuance of injunctive relief; thus, the Court need not issue any bond order in connection with this temporary restraining order.

WHEREFORE, Cardinals respectfully prays that this Court enter a Temporary Restraining Order (and thereafter a preliminary injunction) against Plaintiff Power Investments, LLC, in the

manner and form as set forth in the proposed filed concurrently herewith, and for such other and further relief as this Court deems just and proper.

Dated: February 25, 2022

Respectfully submitted,

DENTONS US LLP

By: /s/ Stephen J. O'Brien
Stephen J. O'Brien #43977MO
One Metropolitan Square, Suite 3000
St. Louis, Missouri 63102
Telephone: (314) 241-1800
Facsimile: (314) 259-5959
stephen.obrien@dentons.com

By: /s/ Wayne C. Stansfield
REED SMITH LLP
Joseph J. Tusso
Wayne C. Stansfield
Three Logan Square
1717 Arch Street, Suite 3100
Philadelphia, Pennsylvania 19103
Telephone: (215) 851-8100
Facsimile: (215) 851-1420
jtuso@reedsmith.com
wstansfield@reedsmith.com
(admitted pro hac vice)

Attorneys for Cardinals Preferred, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was electronically filed on February 25, 2022 with the United States District Court for the Eastern District of Missouri using the CM/ECF system which will send notification of such filing to all parties requesting electronic notice.

/s/ Wayne C. Stansfield
Wayne C. Stansfield